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## **VIA ECF**

Honorable Cathy L. Waldor, U.S.M.J. U.S. District Court for the District of New Jersey Martin Luther King Jr. Federal Building and U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: In re Extradition of Steven Lee, Mag No. 23-9089

Dear Judge Waldor:

As the Court is aware, this Firm represents Respondent Steven Lee in the above-captioned matter, which is currently pending before Your Honor. In March 2023, Mr. Lee was released on bail subject to certain conditions, including that Mr. Lee and his sons, Jonathan and Andrew Lee, surrender their passports to the Office of Pretrial Services. *See* ECF No. 9 at 2. Those passports remain in the possession of the Office of Pretrial Services. I write, with the consent of the Government and the Office of Pretrial Services, to respectfully request the temporary release of the passport of one of Mr. Lee's sons (Jonathan Lee) in order to permit him to attend a close friend's wedding outside of the country.

Specifically, wedding at issue is scheduled to take place later this month in Mexico. In order to attend, Jonathan plans to travel on Wednesday, November 15, 2023, and return on Sunday, November 19, 2023. Accordingly, we request that he be permitted to collect his passport from the Office of Pretrial Services up to two days before his travel (at the recommendation of the Office of Pretrial Services) and return it the first business day after his return. All other conditions currently in effect to assure Respondent Lee's appearance will, of course, remain in effect (Your Honor may recall that Respondent is currently on house arrest, and is at home recovering from open-heart, quadruple-bypass surgery). As noted, I have consulted with Assistant U.S. Attorney Carolyn Silane, who has very graciously consented to this request. If the foregoing meets with Your Honor's approval, we have provided a proposed consent order for the convenience of the Court. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. We thank the Court for its very kind consideration of this request.

Respectfully submitted,

s/ Anne M. Collart
Anne M. Collart, Esq.